

Legal Notice

USDC - GREENBELT  
24 APR 19 PM 12:05

From:

Jeffery Battle  
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Laurel, MD 20725  
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Phone: (301) 613-6104

04/19/2024

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To:

Microsoft Corporation Regional Agent:  
DLA Piper LLP (US)  
650 South Exeter Street, Suite 1100  
Baltimore, MD 21202-4576  
ATTN: Brett Ingerman (Bar No. 23037)  
Tel: (410) 580-3000  
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**RE: Jeffery Battle (Plaintiff) vs Microsoft Corporation (Defendant) – civil case: 1:23-cv-01822, Cease & Desist - Fourth Notice to Defendant**

To Attorney Brett Ingerman:

This Cease & Desist, fourth notice, is about Plaintiff, Jeffery Battle, concerning his name and business “Battle Enterprises, LLC”. Accordingly, please direct all correspondence to the Plaintiff and the United States District Court of Maryland.

Microsoft through its “Microsoft Bing” search engine and “Copilot” function, has engaged in the act of defaming Mr. Battle, his business, and other claims, propagating false information about Mr. Battle that could have a substantial impact on his personal and professional life, personal property, and livelihood. For context, Mr. Battle is an author, professor, President and Chief Executive Officer (CEO) of his company, Battle Enterprises, LLC, and subsidiary The Aerospace Professor Company, a United States military veteran, and journalist, who is in the process of promoting his new autobiography, intellectual property brand (Logo), among other personal and public business ventures. From May 2023 until the present, Microsoft, through their search engine Bing, has generated false statements conflating Mr. Battle with a person of a similar name, Jeffrey Leon Battle, who is a convicted terrorist, to the professional and personal detriment of Mr. Battle and his family. Please note that the distinction between Mr. Battle and Jeffrey Leon Battle is in the spelling of their first name and Plaintiff has no middle name.

Recently, Mr. Battle discovered that Microsoft’s “Microsoft Bing” search engine and “Copilot” function, is generating false information connecting and associating Mr. Battle and his business “Battle Enterprises, LLC” with Jeffrey Leon Battle a convicted terrorist.

*First*, the plaintiff noticed when searching his name in Bing, a link for “Jeff Battle liability” would appear. Selecting or clicking on the link reveals a webpage that states:

1. “Jeffery Battle and Battle Enterprises, LLC: There’s also mention of Jeffery Battle being sentenced to eighteen years in prison after pleading guilty to seditious conspiracy and levying war against the United States”. (emphasis added) *See Attachment A – dated 4/18/2024, pages 1 and 2.*

*Secondly*, the plaintiff noticed when searching his name in Bing, a link for “Jeff Battle liability” would appear. Selecting or clicking on the link reveals a webpage that states:

2. “Battle Enterprises, LLC: Jeffrey Battle’s company, Battle Enterprises, LLC, is also involved in the legal proceedings. Battle himself was sentenced to eighteen years in prison after pleading guilty to seditious conspiracy and levying war against the United States. He had two years added to his sentence for refusing to testify before a grand jury.”

The plaintiff, Jeffery Battle, and as the President and CEO of Battle Enterprises, LLC, did not “plead guilty to seditious conspiracy and levying war against the United States.” Mr. Battle’s company was not “involved in the legal proceedings.” Jeffrey Battle, note the spelling of the first name, is a convicted terrorist.

For nearly a year, Microsoft has continued numerous different types of false activities, labeling the plaintiff and his personal property as terrorist and terrorist owned. First, these reports falsely, materially, and detrimentally connect and imply that Jeffrey Leon Battle a convicted terrorist, is Mr. Battle. Secondly, Microsoft falsely, materially, and detrimentally connected and implied that a convicted terrorist is the owner of Plaintiff’s business.

These false connections through Bing searches, which are directly attributed to Mr. Battle and his personal property through Microsoft “Bing”, have, and will continue, to severely damage Mr. Battle’s professional and personal reputation, harm his personal property, and could lead to threats of violence against him and his family. While Mr. Battle has been dealing with this false attribution of facts to his name and property for nearly a year, he is attempting to promote his autobiography, intellectual property (log), and other business endeavors. In light of these false statements, Mr. Battle has ceased marketing, promotions, and business sales activities related to his new book, intellectual property, and other private business endeavors, to his own financial, personal, and professional detriment.

Mr. Battle attempted to go through the appropriate measures and processes to communicate with Microsoft before engaging in a civil action. In addition, the plaintiff has observed that Microsoft Bing and the Artificial Intelligence (AI) Copilot function continue to conflate Mr. Battle’s facts with Jeffery Leon Battle’s facts in numerous other instances.

Proof included in the complaint and cease-and-desist notices that have been presented, suggests that Microsoft cannot correct or control the AI outputs, making the software program a continuous danger to the plaintiff.

The Plaintiff has numerous years of technology experience and an engineering Bachelor of Science degree. He believes that there is AI manipulation involved. *Again, please contact the Federal Bureau of Investigation (FBI) because your numerous false and extremely different and unique activities to harm Mr. Battle appears to be human programmer-assisted and not solely Artificial Intelligence (AI) developed and generated.*

As such, Plaintiff hereby demands that Microsoft immediately cease-and-desist from defaming and committing other unauthorized actions against Mr. Battle, remove all references to Mr. Battle that connect, conflate, or associate his identity with convicted terrorists, and remove the Bing and Copilot searches reporting Mr. Battle as a terrorist and his business as terrorist owned.

Mr. Battle is entitled to seek monetary damages and equitable relief. This is the third cease-and-desist notice forwarded to the defendant, and the Plaintiff has been attempting to resolve this matter through communications with the defendant since May of 2023. Plaintiff will pursue all available legal remedies, including seeking monetary damages, injunctive relief, and other relief according to the civil complaint, and new detrimental information included in all the cease-and-desist notices, which could result in considerable liability to you.

Please immediately respond to the Plaintiff and Maryland District Court concerning this and other cease-and-desist notices.

Regards,

Jeffery Battle, Plaintiff

The image shows two handwritten signatures side-by-side. The signature on the left is "Jeff" and the signature on the right is "Battle".

ATTACHMENTS:

- A. Microsoft's "Bing" search; "Jeff Battle liability" false reporting connecting the plaintiff (Jeffery Battle) and his business (Battle Enterprises, LLC) to "Jeffrey Leon Battle" a convicted terrorist. Dated 4/18/2024.
  
- B. Microsoft's "Bing" search; "Jeff Battle liability" false reporting connecting the plaintiff (Jeffery Battle) and his business (Battle Enterprises, LLC) to "Jeffrey Leon Battle" a convicted terrorist. Dated 4/19/2024.

NOTE: This document and attachments have been forwarded to Defendant by FedEx Next Day Delivery Mail – Signature Confirmation, and Hand delivered to the United States Maryland District Court